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Hon. Richard M. Berman United States District Court Southern District of New York 500 Pearl Street, RM 650 New York, NY 10007

MEMO ENDORSED

M/V GETAI DIC, et al. 08 CV 4820

Our Ref: FS

05 CV 4820

Countinho & Ferrestaal, Inc

July 3, 2008

Richard M. Berman, U.S.D.,

Hon. Sir:

We represent the plaintiff herein. We write to respectfully request an adjournment of the initial pretrial conference scheduled for Tuesday, July 8, 2008, at 9:30 A.M.

This action was filed on May 23, 2008. All defendants have been served via foreign mailing by the Clerk of the Court however the Clerk's office did not serve defendant Daewoo Logistics Corp. until June 30, 2008. No defendants have yet appeared.

Thus, as no defendants have yet appeared and in view of the delay by the Clerk in serving defendant Daewoo Logistics, we respectfully request a 60 day adjournment of the initial case management conference at a time convenient for the Court.

We also enclose courtesy copies of our amended complaint and rule 7.1 statement.

Thank you.

Respectfully,

KTM/